

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE:

BECKHAM JEWELRY, LLC,

CASE NO: 25-01234-JAW

DEBTOR.

CHAPTER 11

**RESPONSE TO DEBTOR’S MOTION TO EMPLOY WILKERSON, INC.
AS SALE CONSULTANT [DKT. 58]**

COMES NOW, Creditor TDLDC Retail I, LLC (“Landlord”), by and through undersigned counsel, and files this Response to Debtor’s Motion to Employ Wilkerson, Inc. as Sale Consultant [Dkt. 58], and states:

1. Debtor filed the above-referenced Motion seeking permission to engage a professional consultant to conduct a 7-week sale (June 24 - August 8) with a proposed recovery to Debtor of between \$330,989 – \$377,253.

2. Landlord does not object to the proposed sale provided conditions are put in place to adequately protect Landlord’s interests in the operations and overall value of the commercial development considering the lease prohibits the contemplated sale. *See In re: Friedman’s Inc.*, 336 B.R. 880, 884 (S.D. Bankr. Ga. 2005) (court imposed “reasonable sale restrictions and regulations” on liquidation sales of company closing 164 retail jewelry stores where such sales prohibited by leases).

3. Landlord and Debtor are endeavoring to reach agreement on the referenced issues prior to the June 12, 2025 hearing.

RESPECTFULLY SUBMITTED, this 10th day of June, 2025.

TDLDC RETAIL I, LLC

By: /s/ Robert B. Ireland, III
Robert B. Ireland, III (MSB # 100708)
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CERTIFICATE OF SERVICE

I, Robert B. Ireland, III, do hereby certify that I have caused to be served the above and foregoing pleading on all parties requesting notice by using the ECF filing system of the court:

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This 10th day of June, 2025.

/s/ Robert B. Ireland, III
ROBERT B. IRELAND, III